FREJKA PLLC Elise S. Frejka Jason S. Rappaport 733 Third Avenue New York, New York 10017 Telephone: (212) 641-0800

Attorneys for Defendants

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ESTATE OF ELAINE COOPER, STEVEN MNUCHIN, as executor, as trustee, and as an individual, ALAN MNUCHIN, as executor, as trustee, and as an individual, GENERATION SKIPPING TRANSFER TRUST FBO ALAN MNUCHIN AND HIS ISSUE UNDER ARTICLE 4 OF THE LAST WILL AND TESTAMENT OF ELAINE TERNER COOPER, a New York trust, GENERATION SKIPPING TRANSFER TRUST FBO STEVEN MNUCHIN AND HIS ISSUE UNDER ARTICLE 4 OF THE LAST WILL AND TESTAMENT OF ELAINE TERNER COOPER, New York trust, TRUST FBO ALAN MNUCHIN UNDER ARTICLE 5A OF THE LAST WILL AND TESTAMENT OF ELAINE TERNER COOPER, a New York trust, TRUST FBO STEVEN MNUCHIN AND HIS ISSUE UNDER ARTICLE

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05167 (SMB)

5B OF THE LAST WILL AND TESTAMENT OF ELAINE TERNER COOPER, New York trust, TRUST FBO E.M. UNDER ARTICLE 5C OF THE LAST WILL AND TESTAMENT OF ELAINE TERNER COOPER, New York trust, TRUST FBO D.M. UNDER ARTICLE 5C OF THE LAST WILL AND TESTAMENT OF ELAINE TERNER COOPER, New York trust, TRUST FBO J.M. UNDER ARTICLE 5C OF THE LAST WILL AND TESTAMENT OF ELAINE TERNER COOPER, New York trust, WILLIAM D. ZABEL, as trustee, and NELL HEFFNER,

Defendants.

NOTICE OF SUBSTITUTION OF COUNSEL AND ORDER

PLEASE TAKE NOTICE that the law firm of Frejka PLLC, 733 Third Avenue, New York, New York 10017, shall be substituted in place of the law firm of Kramer Levin Naftalis & Frankel LLP, 1177 Avenue of the Americas, New York, New York 10036 as counsel of record for Estate of Elaine Cooper, Steven Mnuchin, Alan Mnuchin, Generation Skipping Transfer Trust FBO Alan Mnuchin and His Issue Under Article 4 of the Last Will and Testament of Elaine Terner Cooper, Generation Skipping Transfer Trust FBO Steven Mnuchin and His Issue Under Article 4 of the Last Will and Testament of Elaine Terner Cooper, Trust FBO Alan Mnuchin Under Article 5A of the Last Will and Testament of Elaine Terner Cooper, Trust FBO Steven Mnuchin and His Issue Under Article 5B of the Last Will and Testament of Elaine Terner Cooper, Trust FBO E.M. Under Article 5C of the Last Will and Testament of Elaine Terner Cooper, Trust FBO D.M. Under Article 5C of the Last Will and Testament of Elaine Terner Cooper, Trust FBO J.M. Under Article 5C of the Last Will and Testament of Elaine Terner Cooper, Trust FBO J.M. Under Article 5C of the Last Will and Testament of Elaine Terner Cooper, Trust FBO J.M. Under Article 5C of the Last Will and Testament of Elaine Terner Cooper, Trust FBO J.M. Under Article 5C of the Last Will and Testament of Elaine Terner Cooper, Trust FBO J.M. Under Article 5C of the Last Will and Testament of Elaine Terner Cooper, Trust FBO J.M. Under Article 5C of the Last Will and Testament of Elaine Terner Cooper, William D. Zabel, and Nell Heffner (the "Defendants") in this adversary proceeding. All notices given or required to be given in this adversary proceeding shall be given to and served upon the following:

FREJKA PLLC 733 Third Avenue New York, New York 10017 Attn: Elise S. Frejka

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jrappaport@frejka.com

PLEASE TAKE FURTHER NOTICE THAT the Defendants have knowledge of and

consent to this substitution of counsel.

Dated: New York, New York
March 27, 2015
Dated: New York, New York
March 27, 2015

KRAMER LEVIN NAFTALIS & FREJKA PLLC

FRANKEL LLP

By: /s/ Philip Bentley By: /s/ Elise S. Frejka

March 31, 2015

Philip Bentley
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Dated: New York, New York SO ORDERED:

/s/ STUART M. BERNSTEIN HON. STUART M. BERNSTEIN

UNITED STATES BANKRUPTCY JUDGE